

EXHIBIT F

COPY

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1 EQUAL EMPLOYMENT * IN THE
2 OPPORTUNITY COMMISSION, * UNITED STATES
3 Plaintiff, * DISTRICT COURT
4 vs. * FOR THE
5 WARFIELD-ROHR CASKET * DISTRICT OF MARYLAND
6 COMPANY, INC., * CIVIL ACTION NUMBER:
7 Defendant. * WMN-01-2872

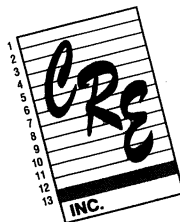
8 * * * * *

9 DEPOSITION OF:

10 WILLIAM HOWARD AYRES,

11 was taken on Thursday, March 21, 2002, commencing
12 at 9:19 a.m., at the Equal Employment Opportunity
13 Commission, 10 South Howard Street, Third Floor,
14 Baltimore, Maryland, before Carla J. Briggs, CSR,
15 RMR, CRR, Notary Public.

16 * * * * *



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1 Q. Well, we're still talking about
2 Exhibit Number 10. Mr. Kuehn1 says that you told
3 him at the time that you fired him that he was
4 too old, made too much money, and that he had to
5 get the fuck out. What do you say to that? Did
6 you say that to him?

7 A. At this time?

8 Q. When you fired him, the day that you
9 fired him.

10 A. I doubt it very much. I did not.
11 There's what it is right there.

12 Q. So you didn't say a word outside of
13 what's on these -- this exhibit; is that correct?
14 If it's not on here, you didn't say it?

15 A. I didn't say that just a little while
16 ago. I just said a little while ago I might
17 have.

18 MR. HIRSCH: You might have said --
19 Howard, you need to be very clear what you're
20 talking about. You said you might have what?
21 Said things that weren't on the paper?

1 MS. ANDREW: Okay.

2 MR. HIRSCH: Okay.

3 Q. So is your answer to my question
4 whether you said what Mr. Kuehnl said you said --
5 and I don't want to repeat it because I've
6 already said it -- do you want me to repeat it?

7 MR. HIRSCH: No.

8 Q. Okay. -- that you did not say that.
9 Is that true?

10 A. I did not say it in the text that he
11 said it.

12 Q. Okay. Did you use the word that I
13 said?

14 A. Yes.

15 Q. Okay. You told him to "Get the fuck
16 out"?

17 A. Yes.

18 Q. Why?

19 A. Because the discussion got a little
20 heavy at times.

21 Q. Why was it heavy? Was he --

1 Q. I'm not asking you to guess.

2 A. You're talking about a long time.

3 Q. Well, Mr. Kuehn1 tells me that you
4 used the "F" word regularly. Would that be a
5 fair and true statement?

6 A. Yes, I probably do too much.

7 Q. In your work premises; is that
8 correct?

9 A. From time to time, yes. And often is
10 how often?

11 Q. Well, I don't know. How often did you
12 use it? Is it every day?

13 A. No. I'm not there every day.

14 Q. Would you consider yourself an
15 even-tempered person?

16 A. Yes.

17 Q. Well, did you use it once a day?

18 A. We're talking too generally. I can't
19 answer you.

20 Q. Did you direct it toward any
21 particular employee or was it just, you know, it